



Advocates for Workplace Fairness

November 9, 2022

Via ECF:

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Ulku Rowe v. Google LLC, Case No. 19-cv-08655 (LGS)(GWG)

Dear Judge Schofield:

We represent the Plaintiff, Ulku Rowe in the above-referenced matter and write on behalf of all parties. Per the Court's September 27, 2022 Order (ECF No. 221), the parties engaged in private mediation on November 4, 2022 but were unable to resolve the matter.

We write to remind the Court that it postponed expert discovery until after it issued a decision on summary judgment (ECF No. 107). The parties have conferred on an expert schedule and respectfully request that the Court so order the following schedule, which will not impact the deadlines the Court set in its Trial Scheduling Order (ECF No. 225):

Description	Proposed Deadline
Plaintiff's expert report	November 18, 2022
Defendant's expert report	December 14, 2022
Deadline for parties to file motion related to expert discovery	December 30, 2022
Deadline for party to oppose motion related to expert discovery	January 6, 2023

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Cara E. Greene
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cc: All Parties (via ECF)